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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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September 26, 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

**Re: Federal-State Joint Board on Universal Service,
CC Docket No. 96-45**

Dear Ms. Salas:

Please find enclosed the affidavits of Gene DeJordy, Vice President, Regulatory Affairs, Western Wireless Corporation ("Western Wireless"), certifying that Western Wireless and its subsidiaries that have been designated as eligible telecommunications carriers ("ETCs") will use all universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, in compliance with 47 U.S.C. § 254(e) and 47 C.F.R. §§ 54.313, 54.314, and 54.809. These certifications apply to the states of California, Colorado, Iowa, Kansas, Minnesota, Nebraska, Nevada, North Dakota, Oklahoma, South Dakota, Texas, Utah, and Wyoming.

Although Western Wireless has filed similar certifications with the respective state commissions that have granted the company ETC status, Western Wireless also is filing the certifications directly with the FCC as a precautionary measure, because it remains unclear whether some of the commissions will comply with the Commission's directive to submit Western Wireless' name to the FCC for certification purposes in a timely manner.

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Page 2

Please contact me if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script, reading "David Sieradzki".

David L. Sieradzki
Counsel for Western Wireless

Enclosures

cc: Irene Flannery, Universal Service Administrative Co.
Katherine Schroder
Richard Smith

DESIGNATION OF COMMON CARRIERS	§	FEDERAL
AS ELIGIBLE TELECOMMUNICATIONS	§	
CARRIERS (ETC) TO RECEIVE FEDERAL	§	COMMUNICATIONS
UNIVERSAL SERVICE FUNDS PURSUANT	§	
TO THE FEDERAL COMMUNICATIONS	§	COMMISSION
COMMISSION'S FOURTEENTH REPORT	§	
AND ORDER ADOPTING A STATE	§	
CERTIFICATION PROCESS	§	

STATE OF WASHINGTON
COUNTY OF KING

DECLARATION OF GENE DEJORDY

1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. In California, Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the non-rural telephone company exchanges of Pacific Bell and Verizon by the California Public Utilities Commission, for purposes of receiving federal universal service support. See Resolution T-16436 by Order dated July 20, 2000. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only

for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313 -- .314.

3. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (rel. Nov. 2, 1999); *Federal-State Joint Board on Universal Service*, Fourteenth Report and Order and Twenty-Second Order on Reconsideration, 16 FCC Rcd 11244 ¶ 188 (rel. May 23, 2001).

4. In California, Western Wireless has not yet launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in California only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential

Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in California, which range from \$24.99 per month plus 35 cents per minute for usage over 75 minutes per month, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

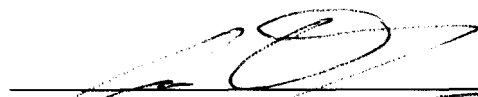
6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless


anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e), and the Commission should file a certification letter to that effect pursuant to 47 C.F.R. § 54.313 and § 54.314.

I declare under penalty of perjury that the foregoing is true and correct.


Gene DeJordy

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, on this the 19th day of September, 2001.


Notary Public

State of Washington

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DESIGNATION OF COMMON CARRIERS	§	FEDERAL
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CARRIERS (ETC) TO RECEIVE FEDERAL	§	COMMUNICATIONS
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2. WWC Holding Co. Inc., a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. In Colorado, Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of non-rural telephone company exchanges and certain rural telephone company study areas by the Colorado Public Utilities Commission, for purposes of receiving federal universal service support. See In the Matter of the Application of WWC Holding Co., Inc. for Designation as an Eligible Telecommunications Carrier, Report and Order, Colorado Docket No. 00K- 255T by order dated January 8, 2001. Section 254(e) of the Communications Act, 47 U.S.C.

§ 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313 -- .314.

3. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (rel. Nov. 2, 1999); *Federal-State Joint Board on Universal Service*, Fourteenth Report and Order and Twenty-Second Order on Reconsideration, 16 FCC Rcd 11244 ¶ 188 (rel. May 23, 2001).

4. In Colorado, Western Wireless has not yet launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Colorado only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential

Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Colorado, which range from \$24.99 per month plus 35 cents per minute for usage over 75 minutes per month, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

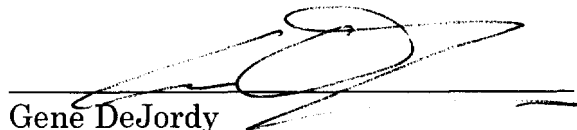
6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to


support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e), and the Commission should file a certification letter to that effect pursuant to 47 C.F.R. § 54.313 and § 54.314.

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2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. In Iowa, Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in certain non-rural telephone company exchanges and rural telephone company study areas by the Iowa Utilities Board, for purposes of receiving federal universal service support. See In the Matter of the Application of WWC License LLC for Designation as an Eligible Telecommunications Carrier, Report and Order, Iowa Docket No.199 IAC 39.2(4) by order dated November 21, 2000. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal

service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313 -- .314.

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4. In Iowa, Western Wireless has not yet launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Iowa only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly

price of \$14.99, which includes all local usage. This is substantially less than Western Wireless' prices for conventional cellular service plans in Iowa, which range from \$24.99 per month plus 35 cents per minute for usage over 75 minutes per month, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

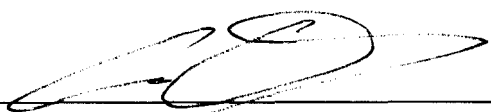
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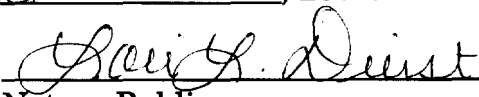
customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

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4. In Kansas, Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Kansas only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

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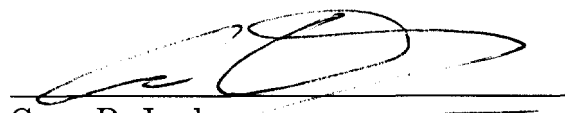
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